

Donald Yannella, P.C.
Attorney at Law
Member of NY & NJ Bars
233 Broadway, Suite 2370
New York, NY 10279

Tel: (212) 226-2883
Fax: (646) 430-8379
nynjcrimlawyer@gmail.com

June 9, 2016

Hon. P. Kevin Castel
United States District Court
Daniel P. Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Andre Heredia-Cuevas
15 Cr. 592 (PKC)

Dear Judge Castel:

I am counsel for Andre Heredia-Cuevas, who is scheduled to be sentenced on Monday, June 13, 2016 at 2 PM.

I write to apologize for the late filing of my sentence memorandum. I have been on trial in Bronx County Supreme Court since the end of March, and I return to court for a verdict tomorrow. My sentence memorandum was filed yesterday evening. I respectfully request that Your Honor accept the late filing.

Sincerely,

/s/

Donald J. Yannella, Esq.